

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

KNIFE RIGHTS INC., *et al.*,

Plaintiffs,

v.

MERRICK GARLAND, *et al.*,

Defendants.

Civil Action No. 4:23-cv-547-O

CONSENT MOTION FOR EXTENSION OF TIME

Defendants respectfully request a two-week extension of time to respond to Plaintiffs' Motion for Summary Judgment, ECF No. 20. In support of this request, Defendants state the following.

On September 19, 2023, Plaintiffs moved for a two-week extension of time to file their Motion for Summary Judgment, and Defendants consented to that request. *See* ECF No. 18 at 2. The Court granted Plaintiffs' Motion, and Plaintiffs subsequently filed their Motion for Summary Judgment on the revised deadline of October 6, 2023. *See* ECF No. 20.

While undersigned counsel for Defendants has been working expeditiously to prepare Defendants' response and cross-motion to dismiss, undersigned counsel recently suffered from an illness that precluded work for a significant period of time. Defendants therefore require a short extension of time to prepare their response and cross-motion, to ensure that their arguments are fully presented to the Court. In addition, Plaintiffs' Motion for Summary Judgment includes appendices totaling over 1,000 pages in length. *See* ECF Nos. 20-2, 20-3. Defendants also require an extension to review and respond to these lengthy filings.

Accordingly, Defendants request a two-week extension of time to respond to Plaintiffs' Motion for Summary Judgment, and a corresponding extension of further briefing deadlines, as follows:

- On or before November 17, 2023, Defendants will file their Opposition and Cross-Motion to Dismiss;
- On or before December 15, 2023, Plaintiffs will file their Opposition and Reply;
- On or before January 5, 2024, Defendants will file their Reply.

Defendants further request that their deadline to respond to the Complaint be extended to November 17, 2023.

Defendants conferred with Plaintiffs, through counsel, and Plaintiffs consented to the requested relief.

Dated: October 18, 2023

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

BRIGHAM J. BOWEN
Assistant Branch Director

/s/ Michael Drezner
MICHAEL DREZNER
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Attorneys for Defendants

CERTIFICATE OF CONFERENCE

The parties conferred, through counsel, on October 17, 2023, and Plaintiffs consented to the relief requested herein.

/s/ Michael Drezner
MICHAEL DREZNER
Trial Attorney
U.S. Department of Justice

CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2023, I electronically filed the foregoing document with the Clerk of Court using this Court's CM/ECF system, which will notify all counsel of record of this filing.

/s/ Michael Drezner
MICHAEL DREZNER
Trial Attorney
U.S. Department of Justice